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6 Attorneys for Defendants
7 JOHNSON & JOHNSON SERVICES, INC.,
8 JOHNSON & JOHNSON (erroneously sued as
"Johnson & Johnson, Inc."), DEPUY
ORTHOPAEDICS, INC., PINNACLE WEST
ORTHOPAEDICS, INC, and GOLDEN STATE
ORTHOPAEDICS, INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

13 LAURA NELSON.

14 Plaintiff,

15

16 JOHNSON & JOHNSON SERVICES, INC.;
17 JOHNSON & JOHNSON, INC.; DEPUY
18 ORTHOPAEDICS, INC.; THOMAS
19 SCHMALZRIED, M.D.; PINNACLE WEST
ORTHOPAEDICS, INC.; GOLDEN STATE
ORTHOPAEDICS, INC.; and DOES ONE
through ONE HUNDRED.

20 | Defendants.

CASE NO. C-12-4664-MEJ

**PROPOSED ORDER RE: STIPULATION
TO STAY ALL PROCEEDINGS**

22 Upon consideration of the Stipulation to Stay Proceedings submitted by Plaintiff LAURA
23 NELSON and Defendants DEPUY ORTHOPAEDICS, INC., JOHNSON & JOHNSON,
24 JOHNSON & JOHNSON SERVICES, INC., PINNACLE WEST ORTHOPAEDICS, INC.,
25 GOLDEN STATE ORTHOPAEDICS, INC., and THOMAS P.SCHMALZRIED, M.D., (hereafter
26 collectively “the Parties”); upon consideration of all documents, files, and pleadings in this action;
27 and upon good cause shown, it is hereby ORDERED that:

28 1. The Parties' request for a stay of proceedings is GRANTED;

1 2. All proceedings in this action are hereby stayed, pending a decision by the Judicial
2 Panel on Multidistrict Litigation on whether this case should be transferred to *In re DePuy*
3 *Orthopaedics, Inc. Pinnacle Hip Implant Products Liability Litigation*, MDL Docket No. 2244.

4 3. Deadlines relating to any outstanding responsive pleading are extended pending
5 entry of a Scheduling Order in the MDL court addressing responsive pleadings and the deadline to
6 file any remand motion is extended pursuant to the MDL court's August 14, 2012 "Order
7 Regarding Cases Removed from State Court," and any subsequent orders that the MDL Court may
8 issue.

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10 PURSUANT TO STIPULATION, IT IS SO ORDERED.

11 Dated: Sept. 17th, 2012



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1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 At the time of service, I was over 18 years of age and **not a party to this action**. I am
4 employed in the County of Los Angeles, State of California. My business address is 355 South
Grand Avenue, Fifteenth Floor, Los Angeles, California 90071-1560.

5 On September 13, 2012, I served true copies of the following document(s) described as
6 **PROPOSED ORDER RE: STIPULATION TO STAY ALL PROCEEDINGS** on the
interested parties in this action as follows:

7 Khaldoun A. Baghdadi, Esq.
8 Spencer J. Pahlke, Esq.
9 WALKUP, MELODIA, KELLY &
SCHOENBERGER
10 650 California Street, 26th Fl.
San Francisco, CA 94108-2615

Attorney for Plaintiff
LAURA NELSON
T: (415) 981-7210
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11 **BY CM/ECF** for parties that are CM/ECF participants. Service is being made electronically on
12 those parties on the attached list that are registered users of the Court's Electronic Case Filing
System.

13 I declare under penalty of perjury under the laws of the United States of America that the
14 foregoing is true and correct and that I am employed in the office of a member of the bar of this
Court at whose direction the service was made.

15 Executed on September 13, 2012, at Los Angeles, California.

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17 */s/ Alexander G. Calfo*
18 Alexander G. Calfo
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